

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
)	
UNITED STATES OF AMERICA)	
)	
v.)	
)	No. 16-cr-10094-LTS
ROSS MCLELLAN,)	
Defendant)	
_____)	

ASSENTED-TO MOTION TO DISCHARGE MORTGAGE
COLLATERALIZING BOND

Now comes the Defendant Ross McLellan, by and through undersigned counsel, and hereby respectfully moves this Honorable Court for an Order directing the Clerk for the District of Massachusetts to discharge the mortgage that is collateralizing Mr. McLellan's bond.

On April 5, 2016, Mr. McLellan was released on a \$250,000.00 bond collateralized by the family's residence, *see* Dkt. 10, 22. On October 15, 2018, this Honorable Court sentenced Mr. McLellan to *inter alia* 18 months' incarceration. *See* Dkt. 520. Following his appeal, Mr. McLellan's self-surrender date was set for June 22, 2020, and was, upon request, extended to July 7, 2020. *See* Dkt. 568, 569. Mr. McLellan self-reported to his designated BOP facility on July 7, 2020 in accordance with this Honorable Court's Order, *see* Dkt. 569. Accordingly, no bond is necessary to secure Mr. McLellan's release.

WHEREFORE, the defense respectfully requests that this Honorable Court issue an Order directing the Clerk for the District of Massachusetts to discharge the mortgage that is collateralizing Mr. McLellan's bond.

COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

Undersigned counsel conferred with counsel for the Government and the Government, by and through AUSA Stephen Frank, assents to the instant request.

Respectfully Submitted,

/s/ Martin G. Weinberg

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/s/ Maksim Nemtsev

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Dated: July 9, 2020

CERTIFICATE OF SERVICE

I, Maksim Nemtsev, hereby certify that on this date, July 9, 2020, a copy of the foregoing document has been served via Electronic Court Filing system on all registered participants.